

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA**

LYNNE CURRAN, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

HONEYWELL INTERNATIONAL INC.,

Defendant.

Case No. 3:23-cv-00594-RJC

**NOTICE OF MOTION FOR
CONSOLIDATION AND
APPOINTMENT OF
INTERIM CO-LEAD COUNSEL**

DEBBIE JEFFERSON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

HONEYWELL INTERNATIONAL INC.,

Defendant.

Case No. 3:23-cv-00603-FDW

CATHERINE DUNN and DAVE
VALENTINE, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

HONEYWELL INTERNATIONAL IC.

Defendant.

Case No. 3:23-cv-00607-MOC

**NOTICE OF MOTION FOR CONSOLIDATION AND APPOINTMENT OF
INTERIM CO-LEAD COUNSEL**

PLEASE TAKE NOTICE that Plaintiffs Lynne Curran, Debbie Jefferson, Catherine Dunn and Dave Valentine (“Movants”), through their undersigned attorneys, hereby respectfully move this Court for entry of an Order: (1) consolidating the above-captioned related actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure; (2) appointing as interim co-lead counsel Kevin Laukaitis of Laukaitis Law LLC (“Laukaitis”), Daniel Srourian of Srourian Law Firm, P.C. (“Srourian”), and Mason Barney of Siri Glimstad LLP (collectively, “Co-Lead Team”) and David Wilkerson of The Van Winkle Law Firm as liaison counsel pursuant to Rule 23(g); and (3) granting such other relief as the Court may deem appropriate. In support of this motion, Movants rely on the accompanying memorandum of law, supporting declarations with attached exhibits, and all other papers and proceedings had herein.

Dated: October 2, 2023

Respectfully submitted,

/s/ Kevin Laukaitis

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*Local Counsel for Plaintiff Curran and Proposed
Liaison Counsel for the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Kevin Laukaitis
Kevin Laukaitis